

FILED
COMPLAINT

2008 MAR -3 AM 9:34

UNITED STATES DISTRICT COURT

FOR THE

'08 MJ 0622 R

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

v.

COMPLAINT FOR VIOLATION OF

U.S.C. Title 18 Section 2113(a)

JOSIAH JOREL JACKMAN

Bank Robbery

BEFORE

San Diego, California

NAME OF MAGISTRATE

ADDRESS OF MAGISTRATE

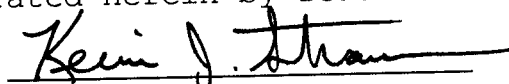
THE UNDERSIGNED COMPLAINANT BEING DULY SWORN STATES:

That on or about February, 29, 2008, San Diego, California, within the Southern District of California:

JOSIAH JOREL JACKMAN


did by force, violence and intimidation unlawfully take from the person and presence of employees at the Bank of America, 7404 Jackson Drive, San Diego, California, United States currency in the sum of \$32,486.00, belonging to, or in the care, custody, management or possession of the Bank of America, 7404 Jackson Drive, San Diego, California, whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113 (a);

And the complainant states that this complaint is based on the attached affidavit which is incorporated herein by reference.



Kevin J. Strauss
Special Agent, FBI

Sworn to before me, and subscribed in my presence on this
3 day of March, 2008.


United States Magistrate Judge

CATHY ANN BENCIVENGO
U.S. MAGISTRATE JUDGE

PROBABLE CAUSE STATEMENT

I declare under penalty of perjury the following statement is true and correct:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), currently assigned to the San Diego Field Office. The information contained in this probable cause statement is based upon my personal knowledge and on information I have learned from reviewing official reports and speaking with other Special Agents of the FBI, San Diego Police Department, and other law enforcement agencies.

2. On Friday, February 29, at approximately 4:15 p.m., I responded to the report of a robbery at the Bank of America, 7404 Jackson Drive, San Diego, California.

3. I have interviewed the victim teller who advised as follows: On Friday, February 29, at approximately 4:30 p.m., the victim teller was at her teller station when a lone male, later identified as JOSIAH JOREL JACKMAN, vaulted the teller counter top and loudly stated, "This is a robbery." JACKMAN ordered all three tellers working behind the counter at that time to open both their top and bottom cash drawers. JACKMAN proceeded to grab stacks of cash out of the cash drawers one by one while repeatedly ordering the tellers to stand back. JACKMAN also grabbed three concealed electronic tracking devices while emptying the cash drawers. Once JACKMAN was finished grabbing the cash, he vaulted back over the counter and departed the bank. The victim teller described JACKMAN as follows:

1 Sex: Male
2 Height: 6'0"
3 Weight: 180 pounds
4 Clothing: Grey long-sleeved hooded
5 sweatshirt, gloves
6 Mask: Reddish cloth-type material
7 wrapped around face

8 4. I have learned the following from Officer
9 Reichner, San Diego Police Department: On Friday, February 29,
10 2008, Officer Reichner and his partner responded to the report of
11 a robbery at the Bank of America, 7404 Jackson Drive, San Diego,
12 California. Officer Reichner and his partner were responding to
13 the bank robbery when they were updated on JACKMAN's position
14 based on the signal received from the electronic tracking device
15 JACKMAN took from the bank. Officer Reichner and his partner
16 found and detained JACKMAN at 6500 Riverdale Drive, San Diego,
17 California. During an inventory search of the car incident to
18 JACKMAN's arrest, a backpack with U.S. currency totaling
19 \$32,486.00 was found on the front passenger side floor area.
20 Included in that money were three concealed electronic tracking
21 devices. Some of the money had spilled out of the backpack onto
22 the car floor area. In the trash dumpster next to where JACKMAN
23 was parked, the grey hooded sweatshirt and reddish cloth JACKMAN
24 wore while robbing the bank were found. Officer Reichner
25 detained JACKMAN until he was advised that a witness had
26 positively identified JACKMAN as the bank robber during a
27 curbside lineup. Officer Reichner then transported JACKMAN to
28 the San Diego Police Department Headquarters.

1 5. On Friday, February 29, 2008, I interviewed JOSIAH
2 JOREL JACKMAN at the San Diego Police Department Headquarters.
3 After being advised of his Miranda Rights, JACKMAN voluntarily
4 provided the following statement: On Friday, February 29, 2008,
5 JACKMAN entered the Bank of America located at 7404 Jackson
6 Drive, San Diego, California. JACKMAN vaulted the counter,
7 announced that he was robbing the bank, and ordered all three
8 tellers to open their top and bottom cash drawers and to step
9 back. The victim tellers complied with JACKMAN's demands and
10 JACKMAN proceeded to grab handfuls of cash from each open drawer.
11 JACKMAN placed the loot from the teller drawers into a black
12 backpack he brought with him into the bank. Once finished,
13 JACKMAN vaulted back over the counter and fled the bank on foot.
14 As JACKMAN departed the bank, he took off his cloth mask and ran
15 to his parked car in a nearby residential area. JACKMAN's
16 apartment is located at 6532 Reflection Drive, San Diego,
17 California and JACKSON drove to an area near the apartment.
18 JACKMAN proceeded to go through the backpack looking for any
19 tracking devices. While doing so, JACKMAN was approached and
20 detained by the police.

21 6. JACKMAN is described as follows:

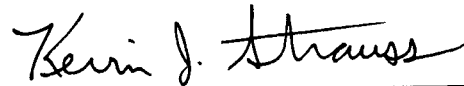
22	Name:	JOSIAH JOREL JACKMAN
23	Race:	Black
24	Sex:	Male
25	Date of Birth:	January 14, 1987
26	Height:	6'0"
27	Weight:	210 pounds
28	Hair:	Black

Eyes: Brown

Social Security #: XXX-XX-8349

7. I have learned from Special Agent Michael Lombardi that the deposits of the Bank of America, 7404 Jackson Drive, San Diego, California, were insured by the Federal Deposit Insurance Corporation (FDIC) at the time of the robbery. The Bank of America, 7404 Jackson Drive, San Diego, California, estimated its loss to be approximately \$32,000.00 as a result of the robbery. The Bank of America was unable to provide an exact loss amount as of Friday, February 29, 2008.

Executed on March 1, 2008, at _____ p.m.



Kevin J. Strauss
Special Agent, FBI

On the basis of the facts presented in this probable cause statement consisting of 4 pages, I find probable cause to believe that the defendant named in this probable cause statement committed the offense on February 29, 2008, in violation of Title 18, United States Code, Section 2113(a).

United States Magistrate Judge

Date/Time

Eyes: Brown

Social Security #: XXX-XX-8349

7. I have learned from Special Agent Michael Lombardi that the deposits of the Bank of America, 7404 Jackson Drive, San Diego, California, were insured by the Federal Deposit Insurance Corporation (FDIC) at the time of the robbery. The Bank of America, 7404 Jackson Drive, San Diego, California, estimated its loss to be approximately \$32,000.00 as a result of the robbery. The Bank of America was unable to provide an exact loss amount as of Friday, February 29, 2008.

Executed on March 1, 2008, at _____ p.m.

Kevin J. Strauss

Kevin J. Strauss
Special Agent, FBI

On the basis of the facts presented in this probable cause statement consisting of 4 pages, I find probable cause to believe that the defendant named in this probable cause statement committed the offense on February 29, 2008, in violation of Title 18, United States Code, Section 2113(a).

Cathy Ann Bencivenno

United States Magistrate Judge

3/1/08 @ 2:20 pm

Date/Time

CATHY ANN BENCIVENNO
U.S. MAGISTRATE JUDGE